

FILED
JUN 12 2020
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLIAM ELLIS,

Defendant.

) INDICTMENT

JUDGE PEARSON

) CASE NO. 1:20-cr-302

) Title 21, United States Code,
) Sections 841(a)(1) and (b)(1)(B);
) Title 18, United States Code,
) Sections 922(g) and 924(a)(2)

COUNT 1

(Possession with Intent to Distribute Carfentanil, Heroin, Fentanyl, Cocaine, and Tramadol,
21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

The Grand Jury charges:

1. On or about May 18, 2020, in the Northern District of Ohio, Eastern Division, Defendant WILLIAM ELLIS did knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; fentanyl, a Schedule II controlled substance; carfentanil, a Schedule II controlled substance; cocaine, a Schedule II controlled substance; and tramadol, a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 2

(Felon in Possession of Firearm and Ammunition,
18 U.S.C. §§ 922(g)(1) and 924(a)(2))

The Grand Jury further charges:

2. On or about May 18, 2020, in the Northern District of Ohio, Eastern Division,

Defendant WILLIAM ELLIS, knowing he had previously been convicted of crimes punishable by imprisonment for a term exceeding one year, those being:

- a. Felonious Assault, Ohio Revised Code § 2903.11(A)(2), Felony of the Second Degree, in the Cuyahoga County Court of Common Pleas, CR- 07-498821-A;
- b. Gross Sexual Imposition, Ohio Revised Code § 2907.05(A)(1), Felony of the Fourth Degree, in the Cuyahoga County Court of Common Pleas, CR-07-495646-A;
- c. Kidnapping, Ohio Revised Code § 2905.01(A)(2), Felony of the First Degree, in the Cuyahoga County Court of Common Pleas, CR-07-495646-A;
- d. Drug Trafficking, Ohio Revised Code § 2925.03(A)(2), Felony of the Fourth Degree, in the Cuyahoga County Court of Common Pleas, CR-97-349373-ZA;

did knowingly possess in, and affecting interstate and foreign commerce firearms and ammunition, to wit: a Smith & Wesson Revolver Serial Number #1D65044; 9 millimeter ammunition; 5.56 caliber ammunition; and 7.62 caliber ammunition; said firearms and ammunition having been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

FORFEITURE

The Grand Jury further charges:

3. For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853; Title 18, United States Code, Section 924(d)(1); and Title 28, United States Code Section 2461(c), the allegations of Counts 1 through 2 are incorporated herein by reference. As a result of the foregoing offenses, Defendant WILLIAM ELLIS shall forfeit to the United States any and all property constituting or derived from any proceeds he obtained directly or indirectly

as a result of such violations; any and all of his property used or intended to be used in any manner or part to commit or to facilitate the commission of such violations; and, any and all firearms and ammunition involved in or used in the commission of such violations; including, but not limited to, the following:

- a. a Smith & Wesson Revolver Serial Number #1D65044 seized on May 18, 2020;
- b. 9 millimeter ammunition seized on May 18, 2020;
- c. 5.56 caliber ammunition seized on May 18, 2020; and
- d. 7.62 caliber ammunition seized on May 18, 2020.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.